

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DANIEL JOYCE,)	
INDIVIDUALLY AND ON BEHALF OF A)	
CLASS OF OTHERS SIMILARLY)	
SITUATED)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.05-11428 – WGY
)	
JOHN HANCOCK FINANCIAL SERVICES,)	
INC. AND JOAN M. DICICCO)	
)	
Defendants.)	
)	
)	

INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants, John Hancock Financial Services Inc. (“Hancock”), and Joan M. DiCicco (“Ms. DiCicco”) (collectively “Defendants”) provide these initial disclosures to Plaintiff Daniel Joyce (“Joyce”). These disclosures are made without in any way waiving any objections as to competency, relevancy, materiality, privilege and admissibility as evidence of these disclosures in this or any related action.

Defendants reserve the right to revise, correct, supplement, clarify and/or amend the disclosures set forth below.

- (A) Name, address (if known), and telephone number (if known) of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, identifying the subjects of the information;**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Defendants identify the following individuals who are likely to have discoverable information relevant to disputed facts in this litigation:

1. Joan M. DiCicco
John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117
2. Peter Mongeu
John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117
3. Sandra M. Colley
c/o John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117

Mr. Mongeau and Mss. DiCicco and Colley have knowledge relating to the initial determination not to grant severance benefits to Mr. Joyce.

4. Carlton Granton
John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117
5. Brian Bisciotti
John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117
6. Kathy Suchenski
John Hancock Financial Services, Inc.
John Hancock Place
Boston, MA 02117

Messrs. Granton, and Bisciotti, and Ms. Suchenski have knowledge relating to Mr. Joyce's appeal of Hancock's denial of severance benefits.

7. Beacon Capital Partners, LLC
One Federal Street
Boston, MA 02110

Beacon Capital Partners LLC has knowledge regarding the employment offer, and employee benefit package offered to Mr. Joyce.

- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;**

The following categories of documents are located in Boston, Massachusetts and will be produced in accordance with Fed. R. Civ. P. 26.

1. Documents concerning the initial determination not to grant severance benefits to Mr. Joyce.
2. Documents concerning the appeal of Mr. Joyce's denial of severance benefits.
3. The documents referred to by Plaintiff as the John Hancock Severance Plan, and the Plan Amendment, and attached as Exhibits A & B to the Complaint.

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;**

This is not applicable to Defendants.

- (D) For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Defendants are not presently aware of any such insurance agreement.

Respectfully submitted,

JOHN HANCOCK FINANCIAL SERVICES, INC.
AND JOAN M. DICICCO

By their attorneys,

/s/ Anthony M. Feeherry

Anthony M. Feeherry (BBO #160860)

Daniel P. Condon (BBO #547676)

Iraida J. Alvarez (BBO #647521)

GOODWIN PROCTER LLP

Exchange Place

Boston, MA 02109-2881

617.570.1000

CERTIFICATE OF SERVICE

I, Anthony M. Feeherry, hereby certify that on January 12, 2006 this document was filed through the ECF system, and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Anthony M. Feeherry

Date: January 12, 2006

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